## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORTH WORTH DIVISION

MARTHA KINARD, Regional Director of the	)
Sixteenth Region of the National Labor	
Relations Board,	
for and on behalf of the	)
NATIONAL LABOR RELATIONS BOARD,	) Civil Action No. 4:16-cv-952-0
	)
Petitioner,	)
V.	)
	)
DISH NETWORK COMPANY,	)
	)
Respondent.	)

## <u>DISH NETWORK COMPANY'S UNOPPOSED</u> MOTION TO FILE RESPONSE TO AMICUS BRIEF

Now comes Respondent, DISH Network Company ("DISH"), and files this Unopposed Motion for Leave to File a Response Brief in the above-captioned matter stating as follows:

- 1. The Communications Workers of America, AFL-CIO ("CWA") filed an *Amicus Curiae* Brief with this Court on November 10, 2016 (subsequently docketed as Doc. No. 29), in which the CWA raised new factual allegations and arguments for the Court's consideration.
- 2. DISH respectfully requests that this Court provide it leave to file a Response brief to address the new issues.
- 3. DISH's Response Brief, attached as Exhibit A, is limited to addressing new issues raised by the CWA.

# Respectfully submitted,

#### /s/Brian D. Balonick

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Dated: November 16, 2016

#### **CERTIFICATE OF CONFERENCE**

I hereby certify that on November 14, 2016, I conferred with counsel for Petitioner and Petitioner concurs with this motion.

/s/ Brian D. Balonick
Brian D. Balonick

### **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed a copy of the foregoing and that the Court's Electronic Filing System will provide notice of this filing to counsel of record for all parties.

/s/ Brian D. Balonick
Brian D. Balonick